

DL Design Best Practices

1. Distributed Learning (DL) training and education products are produced for web-based delivery from the .mil domain. Although protected from viewing by the general public, the content is not protected from abuse by individuals who would seek to invade an individual's privacy or steal an individual's identity. There is no guarantee other than to follow the established guidelines for the protection of personally identifiable information (PII).

- a. DoD 5400.11, DOD Privacy Program, 8 May 2007, para E2.2 and DoD 5400.11-R, Department of Defense Privacy Program, 14 May 2007, para DL1.14 define personal information as the following: "Information about an individual that identifies, links, relates, or is unique to, or describes him or her, e.g., a social security number; age; military rank; civilian grade; marital status; race; salary; home/office phone numbers; other demographic, biometric, personnel, medical, and financial information, etc. Such information is also known as personally identifiable information (i.e., information which can be used to distinguish or trace an individual's identity, such as their name, social security number, date and place of birth, mother's maiden name, biometric records, including any other personal information which is linked or linkable to a specified individual."
- b. AR 340-21, Army Privacy Program, 5 July 1985, paragraph 4-2a states: "Whenever personal information is requested from an individual that will become part of a system of records retrieved by reference to the individual's name or other personal identifier, the individual will be furnished a Privacy Act Statement. This Statement is to ensure that individuals know why this information is being collected so they can make an informed decision on whether or not to furnish it." Simply put, use of personal information (to include use of personal information in courseware) requires a Privacy Act Statement. The use of screen shots from an existing application typically goes beyond the use described in the original Privacy Act Statement.

2. All Requesting Activities (RAs) that seek to use the Combined Arms Products for Distributed Learning (CAPDL) will ensure compliance with DoD and Army regulations and guidance is followed. This means the:

- c. Use of names, SSN, rank, and other personally identifiable information (PII) is prohibited in any distributed learning training and education product.
- d. Use of images (photograph or graphic) that includes PII is prohibited in any distributed learning training and education product.
- e. Use of images procured from the U.S. Army Public Affairs Office is free of PII and that written permission is obtained for any image of soldiers or civilians in still or motion imagery. This written permission must be provided to the TADLP for inclusion in the contract file.

References:

a. DoD 5400.11, DOD Privacy Program, 8 May 2007 b. DoD 5400.11-R, Department of Defense Privacy Program, 14 May 2007 c. AR 340-21, Army Privacy Program, 5 July 1985 d. Privacy Act of 1974 e. OMB Memo M-07-16, Safeguarding Against and Responding to the Breach of Personally Identifiable Information, 21 Sep 2007